

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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	:	
UNITED STATES OF AMERICA,	:	
	:	
- v. -	:	
	:	
TODD NEWMAN, and	:	No. 12-CR-00121 (RJS)
ANTHONY CHIASSON,	:	
	:	
	:	
	:	
Defendants.	:	
	:	
-----	X	

NOTICE OF MOTION

PLEASE TAKE NOTICE that Defendant Todd Newman, by and through his respective counsel, will move this Court, before the Honorable Richard J. Sullivan, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at a time and date to be set by the Court, for an Order severing Mr. Newman's case from that of co-defendant Anthony Chiasson or, in the alternative, precluding Mr. Chiasson from entering into evidence hundreds of emails showing the communication of company-specific information to Mr. Newman; and for such other relief as is just and proper.

Dated: New York, New York
October 9, 2012

Respectfully submitted,

SHEARMAN & STERLING LLP

By: /s/ Stephen Fishbein
Stephen Fishbein

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